

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**PROFESSIONAL FEE MATTERS CONCERNING  
THE JACKSON WALKER LAW FIRM**

**Misc. No. 23-00645**

**UNITED STATES TRUSTEE'S EMERGENCY MOTION TO  
FILE DOCUMENTS UNDER SEAL**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

**Emergency relief has been requested. If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.**

***Relief is requested on or before November 8, 2024***

**TO THE HONORABLE JUDGE EDUARDO V. RODRIGUEZ,  
CHIEF UNITED STATES BANKRUPTCY JUDGE:**

Now comes Kevin M. Epstein, the United States Trustee ("U.S. Trustee") and moves the Court to file a document under seal that have been labeled as "Confidential" by Jackson Walker pursuant to the *Stipulated Protective Order* [ECF No. 202]. In support of this motion, the U.S. Trustee respectfully states as follows:

### **BACKGROUND**

1. On July 30, 2024, the Court entered the *Stipulated Protective Order* [ECF No. 202] which provides, in pertinent parts:

- This Order shall govern the use and disclosure of any and all information designated as “CONFIDENTIAL,” as set forth below, in documents (including email), magnetic media, or other tangible things produced by Jackson Walker or in deposition or examination testimony by Jackson Walker, and provided to the United States Trustee in this case.
- If a document designated “CONFIDENTIAL” is used in any court proceeding or otherwise submitted to a court, the document will be filed under seal and will state on the first page that it contains Confidential Information and that said document is lodged or filed under seal. The Parties shall not electronically file or cause to be filed any Confidential Information with a court unless such Confidential Information is filed under seal.

2. On September 25, 2024, the U.S. Trustee filed his *Expedited Second Motion to Compel Production of Documentation from Jackson Walker LLP* (the “Motion to Compel”). [ECF No. 526]. The Motion to Compel requests the Court order Jackson Walker to provide, among other things, certain sections of Jackson Walker’s Attorney Sourcebook (the “Attorney Sourcebook”) in effect at any time between and including January 1, 2018, and October 6, 2023.

3. The Court has set an evidentiary hearing on Tuesday, November 12, 2024, at 1:30 p.m. to consider the Motion to Compel. [ECF No. 531].

4. Jackson Walker has produced an Index of the Attorney Sourcebook which has been marked “Confidential.” The U.S. Trustee would like to admit the Index as evidence to give the Court context about the specific portions of the Attorney Sourcebook which he is requesting.

5. Good cause exists as set forth above to authorize the U.S. Trustee to file such documents under seal.

### **BASIS FOR EMERGENCY RELIEF**

6. The hearing on the Motion to Compel is set for Tuesday, November 12, 2024. The U.S. Trustee believes the Index will be helpful to the Court when considering the Motion to

Compel. The deadline to file a witness and exhibit list is tomorrow, November 8, 2024. Accordingly, the U.S. Trustee asks for relief by tomorrow and respectfully requests consideration of this Motion on an emergency basis to file the Index before the hearing.

WHEREFORE, the U.S. Trustee, moves the Court for entry of an order authorizing the filing under seal of certain the Index of the Attorney Sourcebook and for such other and further relief as he may be entitled in law or equity.

Date: November 7, 2024

Respectfully Submitted,

KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE  
REGION 7, SOUTHERN AND WESTERN  
DISTRICTS OF TEXAS

By: /s/ Vianey Garza

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2024, I emailed a copy of the *United States Trustee's Emergency Motion to File Document Under Seal* upon the following named person(s) on the date indicated below:

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/s/ Vianey Garza

Vianey Garza

**CERTIFICATE OF ACCURACY**

I certify that the facts set forth in the *United States Trustee's Emergency Motion to File Document Under Seal* are true and correct to the best of my knowledge.

/s/ Vianey Garza

Vianey Garza